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7 SUPERIOR COURT OF WASHINGTON
8 IN AND FOR FRANKLIN COUNTY

9 WASHINGTON TRUST BANK, a
10 Washington banking corporation,

11 Plaintiff,

12 v.

13 EASTERDAY RANCHES, INC., a
14 Washington corporation; EASTERDAY
15 FARMS, a Washington general partnership;
16 CODY EASTERDAY, individually; DEBBY
17 EASTERDAY, individually; KAREN
18 EASTERDAY, individually and in her capacity
19 as personal representative of the Estate of Gale
20 Easterday,

21 Defendants.

NO. 21-2-50049-11

PLAINTIFF'S MOTION FOR ORDER OF
DEFAULT AND DEFAULT JUDGMENT
OR IN THE ALTERNATIVE, MOTION
FOR SUMMARY JUDGMENT

22 Plaintiff Washington Trust Bank, by and through its attorneys, Lukins & Annis, P.S.,
23 moves the Court for an order taking and entering the default of above-named Defendants
24 CODY EASTERDAY, DEBBY EASTERDAY and KAREN EASTERDAY in accordance
25 with CR 55(a) for failure to file an Answer to the Plaintiff's Complaint in this action, and for
judgment in accordance with CR 55(b)(1).

MOTION AND AFFIDAVIT FOR ORDER OF
DEFAULT AND DEFAULT JUDGMENT: 1

LAW OFFICES OF
LUKINS & ANNIS, PS
A PROFESSIONAL SERVICE CORPORATION
717 W Sprague Ave., Suite 1600
Spokane, WA 99201
Telephone: (509) 455-9555
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3/18/21

1 Jurisdiction and venue are proper in Franklin County Superior Court pursuant to RCW
2 2.08.010 and RCW 4.12.025 because at least one of the Defendants resides in Franklin County.

3 This Motion for Default is based upon the Declaration of Burke D. Jackowich and the
4 Declaration of Claire Baker, attached hereto, and upon the files and records herein.

5 In the alternative, Plaintiff Washington Trust Bank moves the Court for an order
6 entering summary judgment for the Plaintiff in accordance with CR 56 based on the
7 Declaration of Burke Jackowich, the Declaration of Claire Baker and the arguments and points
8 of law in the memorandum supporting this Motion.
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10 DATED this 19th day of March, 2021.

11 LUKINS & ANNIS, P.S.

12
13 By 

14 BURKE D. JACKOWICH
15 WSBA# 31722
16 TREVOR R. PINCOCK
17 WSBA #36818
18 Attorneys for Plaintiff
19 Washington Trust Bank
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MOTION AND AFFIDAVIT FOR ORDER OF
DEFAULT AND DEFAULT JUDGMENT: 2

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 26th day of March 2021, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to all counsel of record as follows:

Sussman Shank, LLP Jeffrey C. Misley Thomas Stilley Laurie Hager 1000 SW Broadway, Suite 1400 Portland, OR 97205 <i>Attorneys for Cody and Debby Easterday</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input checked="" type="checkbox"/> Via email
Peter Richter Peter Richter: 200 South Wacker Drive, 31st Floor Chicago, IL 60606 prichter@paladinmgmt.com	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input checked="" type="checkbox"/> Via email
R. Crane Bergdahl 6119 Burden Blvd., Suite A Pasco, WA 99301 P.O. Box 2755 Pasco, WA 99302 cranelaw@msn.com <i>Attorney for Karen Easterday</i>	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input checked="" type="checkbox"/> Via email
CHS Capital, LLC dba CHSC NM 5500 Cenex Dr. Inver Grove Heights, MN 550077	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input type="checkbox"/> Via email

MOTION AND AFFIDAVIT FOR ORDER OF
DEFAULT AND DEFAULT JUDGMENT: 3

3/18/21

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1 U.S. Small Business Administration 2 1545 Hawkins Blvd, Suite 202 3 El Paso, TX 79925	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input type="checkbox"/> Via email
4 Thomas Buford 3 rd 5 Bush Kornfeld, LLP 6 601 Union St., Ste 5000 7 Seattle, WA 98101 8 tbuford@bskd.com	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input type="checkbox"/> Telecopy (FAX) <input checked="" type="checkbox"/> Via email
9 <i>Attorney for Easterday Ranch & Easterday 10 Farms, Inc.</i>	

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12 SHEANA LOOMIS, Legal Assistant

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MOTION AND AFFIDAVIT FOR ORDER OF
DEFAULT AND DEFAULT JUDGMENT: 4

3/18/21

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